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April 7, 1992

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APR - 7 1992

Ms. Donna R. Searcy, Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554 Federal Communications Commission Office of the Secretary

Re: Engineering & Technology Docket No. 92-9

Dear Ms. Searcy:

American Personal Communications ("APC"), pursuant to Section 1.1206(a)(2) of the Commission's Rules, 47 C.F.R. § 1.1206(a)(2) (1991), hereby notifies the Commission that on March 24 and 25, 1992, representatives of APC made a presentation concerning the above-referenced docket with the Commission's staff.

APC's presentation concerned proposals made by APC in General Docket 90-314 for the implementation of new personal communications services ("PCS") in the 1850-1990 MHz band and its proposals for accommodation of incumbent private operational fixed service microwave licensees in that band. APC discussed its continuing belief, based on exhaustive research under its experimental authorization, that PCS and incumbent microwave users can coexist in the 1850-1990 MHz band.

In this regard, APC provided to the staff a spectrum availability study APC performed for Seattle, a copy of which is attached to this notice. Seattle has the most vacant spectrum in the 1.85-1.99 GHz band of the 12 cities APC has studied thus far. At least 100 MHz is vacant in the 1850-1990 MHz band in Seattle in 89.6 of all locations (and all 140 MHz are available in many locations). In those few locations in which 100-140 MHz is not available, between 50 and 100 MHz is available. APC also discussed international development of

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PCS systems and the treatment of incumbency issues in other countries.

Please direct any inquiries concerning this matter to the undersigned.

Very truly yours,

Kurt A. Wimmer



